



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

July 1, 2005

B-19J

Robert M. Gianniny, Forest Planner
Wayne National Forest
13700 Highway 33
Nelsonville, Ohio 45764-9880

Re: Draft Environmental Impact Statement for the Proposed Land and Resource Management Plan for the Wayne National Forest, Athens, Gallia, Hocking, Jackson, Lawrence, Monroe, Morgan, Noble, Perry, Sciota, Viton and Washington Counties, Ohio - EIS No. 20050133

Dear Mr. Gianniny:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the Draft Environmental Impact Statement (EIS) and the Proposed Land and Resource Management Plan (Forest Plan) for the Wayne National Forest (Forest) in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA). We are pleased to have this opportunity to add U.S. EPA's suggestions to the planning effort for the Forest.

Located in southeastern Ohio, the Forest consists of approximately 238,050 acres of forested hills, rock bluffs and shelters, sandstone and shale caves, riparian habitat, a deciduous forest canopy consisting predominantly of oak-hickory forest with scattered pines, and temporary openings created by timber harvests. There is a mix of public and private lands within the Forest's proclamation boundary. The Forest is managed under the multiple use concept, providing for the conservation and wise use of natural resources.

Several issues identified as important to forest planning and the need for change include watershed health, plant and animal habitat, recreation management, land ownership, minerals resource management, and roadless areas, wilderness and wild and scenic river recommendations. The U.S. Forest Service (USFS) evaluated six alternatives in the Draft EIS for revision of the Forest Plan. The six alternatives address these issues in a variety of ways, such that each would meet the stated purpose and need. The Preferred Alternative, Alternative E, provides for diverse wildlife habitats, including extensive tracts of mature forest, and early successional habitat. It would also provide more management for restoration and maintenance of the mixed oak ecosystem than any other alternative, while meeting species viability needs.

This planning effort is timely and critical to the continued health of the Forest. The Forest remains among the few areas capable of maintaining plant and animal diversity on a landscape scale while providing recreational opportunities to satisfy the growing public demand for outdoor

recreational experiences in natural settings.

Because of these demands upon the Forest, the U.S. EPA supports the preferred alternative identified in the Draft EIS. The preferred alternative appears to strike a balance between conservation of the species found on the Forest and wise use. Specifically, the U.S. EPA would like to commend the USFS for recognizing the importance of restoring an oak-hickory composition within its natural range.

Based on our review of the two documents, we have assigned a rating of **EC-2 (Environmental Concerns-Insufficient Information)** to the Draft EIS and the proposed Forest Plan. A summary of the rating system used in the evaluation of these documents is enclosed for your reference. We offer the following comments on the Draft EIS for consideration during development of the Final EIS and the final Forest Plan.

Management for early-successional and grassland habitat

We recommend further justification be included in the Final EIS to support proposed management activities pertaining to these two habitat types. We believe it would be useful to include additional information pertaining to Neotropical migratory bird species (NTMB), many of which have declined during the past 50 years, as a benchmark for the necessity to manage these seral stages.

We appreciate your discussion of population trends for all NTMB Management Indicator Species on their breeding grounds. We suggest the following additional detail be included in the Final EIS: 1) tract size needed to maintain viable populations, particularly for area sensitive species; 2) whether appropriately-sized tracts of suitable habitat currently exist, how many tracts, and where they are located on the Forest; and 3) possible reasons for population declines. Exploring this information for the NTMB associated with the early-successional and grassland habitats should support the DEIS conclusion that proposed management is consistent with the goal of maintaining species viability for the entire suite of NTMB species that use the Forest, which is a major breeding area within the State of Ohio.

Selection of Alternative E as the Preferred Alternative

We recommend the Final EIS and/or Record of Decision include a summary paragraph explaining why Alternative E provides the best management direction for the Forest when compared to Alternatives C, D, or F, which are variations on a theme and thus vary on within a small range. An analysis of the benefits and detriments associated with this management selection over the other three alternatives would make the USFS's reasoning clearer in support of the selection of the preferred alternative. A summary would describe for the public how the USFS will make progress toward its goals for the Forest, particularly with regard to the viability of all species and a suitable mix of habitat.

Increased monitoring

We believe the proposed management activities could be enhanced by including additional monitoring events for species of global concern and invertebrate species, brown-headed cowbirds, and white-tailed deer.

The invertebrate taxa generally do not receive adequate representation in conservation planning largely due to the paucity of data regarding their status. With a concerted sampling effort, baseline information including distribution and population numbers could be developed.

We recommend continued monitoring of brown-headed cowbirds and their effect on the breeding success of NTMB. According to discussions with Forest personnel, recent monitoring efforts have discovered that brown-headed cowbird parasitism is lower in Ohio than levels discovered in Southern Illinois and Southern Indiana. This lower amount of cowbird parasitism on the Forest may be attributed to the fact that the area within the Forest's proclamation boundary is fairly contiguously forested (approximately 80% forested), with less agriculture surrounding the Forest.

We feel continued monitoring of this species and its effect on NTMB is warranted given NTMB's global declining status. Nest parasitism by cowbirds has been shown to be a chief constraint on the breeding success of many Neotropical migrants, effectively causing some breeding areas to become sink populations for certain species because viable populations cannot be maintained with cowbirds present. Because the Forest is one of the last remaining major tracts of forested habitat in the Midwest, cowbirds' effect on Neotropical migrant breeding success is of particular importance. If, in the future, it is discovered that cowbirds are negatively affecting NTMB breeding success at unsuccessful levels, we suggest adaptive management, include a cowbird trapping program.

We also recommend using the data compiled from exclosures to study fuels on the Forest to monitor herbivory effects of white-tailed deer. The results of such monitoring are important to determine the impacts of deer on forest structure and ecology, particularly ginseng. While we acknowledge that the Ohio Department of Natural Resources (ODNR) establishes target numbers for deer harvests, not the USFS, interaction between the USFS and the ODNR would provide useful information to set harvest targets that would, hopefully, keep the deer population to a size not detrimental to the habitat. Lastly, we support the development of a monitoring approach to assess the status of ginseng populations on the Forest and the effects, if any, from selective browsing and harvest. Information regarding these activities should be included in the FEIS.

We welcome the opportunity to meet with the Forest Plan Revision Team to discuss the identified issues and assist the USFS in any way possible between now and the publication of the Final EIS and the Record of Decision. Thank you for your willingness to consider our comments; we hope they will be useful to you. If you have any questions concerning these comments, please contact Kathleen Kowal of my staff at (312) 353-5206.

Sincerely,

/s/ Kenneth A. Westlake 07/01/05

Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Science, Ecosystems and Communities

cc: Randy Moore, Regional Forester
Enclosure – Summary of Rating Definitions